

FAST FACTS

Retention of Title I Files, Materials, Supplies, and Equipment

Federal Records Retention

2 CFR 200.333 states that financial records, supporting documentation, statistical records, and all other non-federal entity records pertinent to a federal award must be retained for a period of three years from the date of submission of the final expenditure report. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-federal entities. The only exceptions are:

1. If any litigation, claim or audit is started before the expiration of the three-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and the final action taken.
2. When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
3. Records for real property and equipment acquired with federal funds must be retained for three years after final disposition.

Files

Title I programs must adhere to the guidelines provided in EDGAR 80.42 regarding records retention and access to records. At a minimum, EDGAR 80.42 requires grant recipients to retain records for a period of three fiscal years, plus the current school year (five calendar years) after the day the final expenditure report for a project has been submitted. If any litigation, claim, negotiation, audit, or other action involving the records has been started prior to the expiration of the three-year period, the records in question must be retained until completion of the action and resolution of all issues, or until the end of the normal three-year period; the latter of the two. After the retention time has lapsed, all confidential files should be shredded.

Required Files

- Consolidated Application and award letter(s)
- Documentation of approved waivers, extensions and/or amendments (as applicable)
- Record of purchase requests, receipts, and disbursements
- Matching expenditures
- Mid-Year and Final Financial Reports
- Documentation of meetings (i.e., board meetings approving application, board meetings approving authorized representative, Title I annual review meetings, affirmation of private school consultation, private school Intent to participate letters)
- Semi-annual certifications and monthly time and effort reports
- Signed building budgets (targeting districts only)
- Plans for teachers not highly qualified
- District and school parent involvement policy and compact
- Parent notifications (i.e., AYP notification, Title I program improvement status, parents' right to know clause, four week notice on non-qualified staff, supplemental education services/school choice)
- Contracts (i.e., supplemental education services vendors, contracted vendors)
- Title I student portfolios (i.e., student selection process, student progress report, parent permission, parent denial of services)
- Parental involvement (i.e., annual parent meeting, training opportunities for parents, assessment of parental involvement)

Materials and Supplies

Defined as those items with a value under \$750. Although materials and supplies are not required to be officially inventoried, they must be marked as "Property of XYZ School District Title [I, II, or III] Program."

Equipment

Defined as those items valued at \$750 or more and ALL computers, furniture, and equipment. Equipment, which must be kept on an official inventory, must be marked as "Property of XYZ School District Title I Program." Technology items purchased with federal funds must be kept on the inventory for five years. After five years, these items lose their identity as purchased with federal funds and then belong to the district. The district has the authority to use or dispose of the technology items as they see fit as long as it is recorded under disposition data.

If you have questions regarding this issue, please contact the Division of Student Support & Innovation at (888) 605-1951.